

JS 44 (Rev. 09/11)

## CIVIL COVER SHEET

The JS 44 civil coversheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

John Johnson

## DEFENDANTS

LexisNexis Group and LexisNexis Risk Solutions Bureau, LLC

(b) County of Residence of First Listed Plaintiff Chester Cty. PA  
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Montgomery Cty. PA  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number)  
Vicki Piontek, Esquire  
Piontek Law Offices  
951 Allentown Rd, Lansdale, PA 19446

Attorneys (If Known)  
Sharon F. McKee, Esquire  
Hangley Aronchick Segal Pudlin & Schiller,  
One Logan Sq., 27th Fl., Philadelphia, PA 19103 T: 215-568-6200

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                            |   |                                       |
|---|----------------------------|---|---------------------------------------|
| PTF                                     | DEF                        | PTF   | DEF                                   |
| <input checked="" type="checkbox"/> 1   | <input type="checkbox"/> 1 | <input type="checkbox"/> 4                                    | <input type="checkbox"/> 4            |
| Citizen of This State                   |                            | Incorporated or Principal Place of Business In This State     |                                       |
| <input type="checkbox"/> 2              | <input type="checkbox"/> 2 | <input type="checkbox"/> 5                                    | <input checked="" type="checkbox"/> 5 |
| Citizen of Another State                |                            | Incorporated and Principal Place of Business In Another State |                                       |
| <input type="checkbox"/> 3              | <input type="checkbox"/> 3 | <input type="checkbox"/> 6                                    | <input type="checkbox"/> 6            |
| Citizen or Subject of a Foreign Country |                            | Foreign Nation  |                                       |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

<b>CONTRACT</b> <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<b>FORFEITURE/PENALTY</b> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157	<b>OTHER STATUTES</b> <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
<b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee (Prisoner Petition) <input type="checkbox"/> 465 Other Immigration Actions				<b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	

## V. ORIGIN

(Place an "X" in One Box Only)

- ☐ 1 Original Proceeding
- ☒ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
15 U.S.C. Section 1681

Brief description of cause:  
Alleged Violations of FCRA

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

## DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

March 5, 2013Sharon F. McKee

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

JOHN JOHNSON

v.

LEXISNEXIS GROUP,  
LEXISNEXIS RISK SOLUTIONS BUREAU, LLC,;  
LEXISNEXIS RISK SOLUTIONS BUREAU, LLC,;  
JOHN DOES 1-10, and  
X,Y, Z CORPORATIONS

:  
:  
: No.:  
:  
:

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See §1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus - Cases brought under 28 U.S.C. §2241 through §2255. ( )
- (b) Social Security - Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- (c) Arbitration - Cases required to be designated for arbitration under Local Civil Rule 53.2. ( X )
- (d) Asbestos - Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management - Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management - Cases that do not fall into any one of the other tracks. ( )

March 6, 2013  
Date

  
Attorney-at-Law

LexisNexis Risk Solutions Bureau LLC  
Attorney for

215-568-6200  
Telephone

215-568-0300  
FAX Number

smckee@hangle.com  
E-Mail Address

**Civil Justice Expense and Delay Reduction Plan  
Section 1:03 - Assignment to a Management Track**

- (a) The clerk of court will assign cases to tracks (a) through (d) based on the initial pleading.
- (b) In all cases not appropriate for assignment by the clerk of court to tracks (a) through (d), the plaintiff shall submit to the clerk of court and serve with the complaint on all defendants a case management track designation form specifying that the plaintiff believes the case requires Standard Management or Special Management. In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.
- (c) The court may, on its own initiative or upon the request of any party, change the track assignment of any case at any time.
- (d) Nothing in this Plan is intended to abrogate or limit a judicial officer's authority in any case pending before that judicial officer, to direct pretrial and trial proceedings that are more stringent than those of the Plan and that are designed to accomplish cost and delay reduction.
- (e) Nothing in this Plan is intended to supersede Local Civil Rules 3 or 7, or the procedure for random assignment of Habeas Corpus and Social Security cases referred to magistrate judges of the court.

**SPECIAL MANAGEMENT CASE ASSIGNMENTS  
(See §1.02(e) Management Track Definitions of the  
Civil Justice Expense and Delay Reduction Plan)**

Special management cases will usually include that class of cases commonly referred to as "complex litigation" as that term has been used in the Manuals for Complex Litigation. The first manual was prepared in 1969 and the Manual for Complex Litigation Second, MCL 2d was prepared in 1985. This term is intended to include cases that present unusual problems and require extraordinary treatment. See §0.1 of the first manual. Cases may require special or intense management by the court due to one or more of the following factors: (1) large number of parties; (2) large number of claims or defenses; (3) complex factual issues; (4) large volume of evidence; (5) problems locating or preserving evidence; (6) extensive discovery; (7) exceptionally long time needed to prepare for disposition; (8) decision needed within an exceptionally short time; and (9) need to decide preliminary issues before final disposition. It may include two or more related cases. Complex litigation typically includes such cases as antitrust cases; cases involving a large number of parties or an unincorporated association of large membership; cases involving requests for injunctive relief affecting the operation of large business entities; patent cases; copyright and trademark cases; common disaster cases such as those arising from aircraft crashes or marine disasters; actions brought by individual stockholders; stockholder's derivative and stockholder's representative actions; class actions or potential class actions; and other civil (and criminal) cases involving unusual multiplicity or complexity of factual issues. See §0.22 of the first Manual for Complex Litigation and Manual for Complex Litigation Second, Chapter 33.

## UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA - DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 670 Marshall Road, Glenmoore, PA 19343  
 Address of Defendant (LexisNexis Group): None because there is no such legal entity as LexisNexis Group  
 Address of Defendant (LexisNexis Risk Solutions Bureau, LLC): 1000 Alderman Drive, Alpharetta, Fulton County, GA 30005  
 Place of Accident, Incident or Transaction: Pennsylvania  
 (Use Reverse Side For Additional Space)

Does this civil action involve a non-governmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?  
 (Attach two copies of the Disclosure Statement Form in accordance with Fed. R. Civ. P. 7.1(a)) Yes ☒ No ☐

Does this case involve multi-district litigation possibilities? Yes ☐ No ☒

## RELATED CASE IF ANY

Case Number: 12-5611 Judge Timothy Savage Date Terminated: November 20, 2012  
 Case Number: 12-5610 Judge Mitchell Goldberg Date Terminated: January 23, 2013

Civil cases are deemed related when yes is answered to any of the following questions:

- Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
 Yes ☐ No ☒
- Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
 Yes ☐ No ☐ Maybe ☒ - not certain because no complaint filed to date.
- Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
 Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

## A. Federal Question Cases:

- ☐ Indemnity Contract, Marine Contract, and All Other Contracts
- ☐ FELA
- ☐ Jones Act - Personal Injury
- ☐ Antitrust
- ☐ Patent
- ☐ Labor - Management Relations
- ☐ Civil Rights
- ☐ Habeas Corpus
- ☐ Securities Act(s) Cases
- ☐ Social Security Review Cases
- ☒ All other Federal Question Cases  
 (Please specify) FCRA, 15 USC § 1681, et seq.

## B. Diversity Jurisdiction Cases:

- ☐ Insurance Contract and Other Contracts
- ☐ Airplane Personal Injury
- ☐ Assault, Defamation
- ☐ Marine Personal Injury
- ☐ Motor Vehicle Personal Injury
- ☐ Other Personal Injury (Please specify)
- ☐ Products Liability
- ☐ Products Liability - Asbestos
- ☐ All other Diversity Cases  
 (Please specify)

## ARBITRATION CERTIFICATION

(Check appropriate category)

I, \_\_\_\_\_, counsel of record do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that, to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000 exclusive of interest and cost;

☐ Relief other than monetary damages is sought

DATE: \_\_\_\_\_ Attorney-at-Law \_\_\_\_\_ Attorney I.D. # \_\_\_\_\_

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: \_\_\_\_\_ Attorney-at-Law \_\_\_\_\_ Attorney I.D. # \_\_\_\_\_

## UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA - DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 670 Marshall Road, Glenmoore, PA 19343  
 Address of Defendant (LexisNexis Group): None because there is no such legal entity as LexisNexis Group.  
 Address of Defendant (LexisNexis Risk Solutions Bureau, LLC): 1000 Alderman Drive, Alpharetta, Fulton County, GA 30005  
 Place of Accident, Incident or Transaction: Pennsylvania  
 (Use Reverse Side For Additional Space)

Does this civil action involve a non-governmental corporate party with any parent corporation and any publicly held corporation owning 10% or more if its stock?  
 (Attach two copies of the Disclosure Statement Form in accordance with Fed. R. Civ. P. 7.1(a)) Yes ☒ No ☐

Does this case involve multi-district litigation possibilities? Yes ☐ No ☒

## RELATED CASE IF ANY

Case Number: 12-5611 Judge Timothy Savage Date Terminated: November 20, 2012  
 Case Number: 12-5610 Judge Mitchell Goldberg Date Terminated: January 23, 2013

Civil cases are deemed related when yes is answered to any of the following questions:

- Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
 Yes ☐ No ☒
- Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
 Yes ☐ No ☐ Maybe ☒ - not certain because no complaint filed to date.
- Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?  
 Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

## B. Federal Question Cases:

- ☐ Indemnity Contract, Marine Contract, and All Other Contracts
- ☐ FELA
- ☐ Jones Act - Personal Injury
- ☐ Antitrust
- ☐ Patent
- ☐ Labor - Management Relations
- ☐ Civil Rights
- ☐ Habeas Corpus
- ☐ Securities Act(s) Cases
- ☐ Social Security Review Cases
- ☒ All other Federal Question Cases  
 (Please specify) FCRA, 15 USC § 1681, et seq.

## B. Diversity Jurisdiction Cases:

- ☐ Insurance Contract and Other Contracts
- ☐ Airplane Personal Injury
- ☐ Assault, Defamation
- ☐ Marine Personal Injury
- ☐ Motor Vehicle Personal Injury
- ☐ Other Personal Injury (Please specify)
- ☐ Products Liability
- ☐ Products Liability - Asbestos
- ☐ All other Diversity Cases  
 (Please specify)

## ARBITRATION CERTIFICATION

(Check appropriate category)

I, \_\_\_\_\_, counsel of record do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that, to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000 exclusive of interest and cost;

☐ Relief other than monetary damages is sought

DATE: \_\_\_\_\_ Attorney-at-Law \_\_\_\_\_ Attorney I.D. # \_\_\_\_\_

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: \_\_\_\_\_ Attorney-at-Law \_\_\_\_\_ Attorney I.D. # \_\_\_\_\_



In support of this Notice of Removal, LexisNexis Risk Solutions Bureau LLC avers as follows:

**I. Background**

1. On August 29, 2012, Plaintiff John Johnson (hereinafter “Johnson”) initiated this action by filing a Writ of Summons in the Court of Common Pleas of Chester County. A copy of the docket and Writ of Summons are attached hereto as Exhibits A and B, respectively.

2. The Writ of Summons seeks judgment and alleges violations under 15 U.S.C. § 1681, et. seq. *See* Ex. B at Civil Cover Sheet.

3. Johnson did not serve the Writ of Summons on LexisNexis Risk Solutions Bureau LLC or anyone else.

4. LexisNexis Group is not a legal entity, is therefore not a proper party and cannot and has not properly been served.

5. The docket does not reflect service of the Writ of Summons upon LexisNexis Risk Solutions Bureau LLC or LexisNexis Group. *See* Ex. A.

**II. LexisNexis Risk Solutions Bureau LLC Has Satisfied the Procedural Requirements for Removal**

6. As required by 28 U.S.C. § 1446(b), this Notice is timely filed as Johnson has not served the Writ of Summons on LexisNexis Risk Solutions Bureau LLC.

7. Venue is proper in this Court pursuant to 28 U.S.C. § 1441(a) because it is the “district and division embracing the place where such action is pending.”

8. No previous application has been made for the relief requested herein.

9. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being served upon counsel for Johnson and a copy is being filed with the Clerk’s office for the Court of Common Pleas of Chester County, Pennsylvania.

**III. This Court Has Subject Matter Jurisdiction Pursuant to 28 U.S.C. § 1331**

10. This Court has subject matter jurisdiction over this case because Johnson alleges violations of the Fair Credit Reporting Act ("FCRA") and the Fair and Accurate Credit Transaction Act ("FACTA"), 15 U.S.C. § 1681, *et. seq.*, which arise under federal law. *See* Ex. B at Civil Cover Sheet.

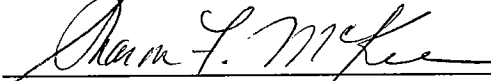
11. This Court has jurisdiction over all civil actions "arising under the Constitution, laws and treaties of the United States" pursuant to 28 U.S.C. § 1331.

12. Accordingly, this case is properly removable under 28 U.S.C. § 1331.

13. By filing this Notice, no defendant waives its right to raise any objection, including without limitation to service of process, sufficiency of process, and defendants specifically reserve the right to assert any defenses and/or objections they are entitled to make, including whether any or all are proper defendants.

**WHEREFORE**, Defendant LexisNexis Risk Solutions Bureau LLC gives notice that the above action now pending in the Court of Common Pleas of Chester County is being removed to this Court.

**HANGLEY ARONCHICK SEGAL PUDLIN &  
SCHILLER**

By:   
Sharon F. McKee (Pa. I.D. No. 81499)  
Bonnie M. Hoffman (Pa. I.D. No. 201140)  
One Logan Square, 27th Floor  
Philadelphia, PA 19103  
(215) 568-6200 (telephone)  
E-mail: [smckee@hanglely.com](mailto:smckee@hanglely.com)  
[bhoffman@hanglely.com](mailto:bhoffman@hanglely.com)

Dated: March 6, 2013

*Attorneys for Defendant LexisNexis Risk Solutions  
Bureau LLC*



IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JOHN WINEBURG,

Plaintiff,

CIVIL ACTION NO.:

v.

LEXISNEXIS GROUP,

and

LEXISNEXIS RISK SOLUTIONS BUREAU, LLC,

and

LEXISNEXIS RISK SOLUTIONS BUREAU, LLC,

and

JOHN DOES 1-10,

and

X,Y, Z CORPORATION,

Defendants.

DISCLOSURE STATEMENT FORM

Please check one box:

☐

The nongovernmental corporate party, \_\_\_\_\_, in the above listed civil action does not have any parent corporation and publicly held corporation that owns 10% or more of its stock.

☒

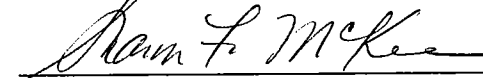
The nongovernmental corporate party, LexisNexis Risk Solutions Bureau LLC, in the above listed civil action has the following parent corporation(s) and publicly held corporation(s) that owns 10% or more of its stock: LexisNexis Risk Solutions Bureau LLC is wholly owned by LexisNexis Risk Data Management Inc. LexisNexis Risk Data Management Inc. is wholly owned by Reed Elsevier, Inc. Reed Elsevier Inc. is wholly owned by Reed Elsevier U.S. Holdings Inc. The ultimate parent company of Reed Elsevier U.S. Holdings, Inc. is Reed Elsevier Group plc. Reed Elsevier PLC and Reed Elsevier NV, both publicly held companies, own 10% or more of the stock of Reed Elsevier U.S. Holdings, Inc.

LexisNexis Group is not a legal entity and therefore does not have a parent corporation and publicly held corporation that owns 10% or more of its stock.

HANGLEY ARONCHICK SEGAL PUDLIN  
& SCHILLER

Dated: March 6, 2013

By:



Sharon F. McKee (Pa. I.D. No. 81499)

Bonnie M. Hoffman (Pa. I.D. No. 201140)

One Logan Square, 27th Floor

Philadelphia, PA 19103

(215) 568-6200 (telephone)

E-mail: [smckee@hangleylegal.com](mailto:smckee@hangleylegal.com)

[bmh@hangleylegal.com](mailto:bmh@hangleylegal.com)

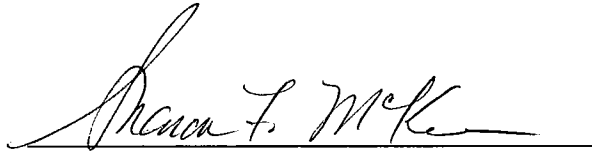
Attorneys for Defendant LexisNexis Risk Solutions  
Bureau LLC

**CERTIFICATE OF SERVICE**

I, Sharon F. McKee, certify that on March 6, 2013, a copy of the foregoing Notice of Removal and Corporate Disclosure Statement were served via Federal Express upon the following:

Vicki Piontek, Esquire  
Piontek Law Offices  
951 Allentown Road  
Lansdale, PA 19446

*Attorney for Plaintiff*

  
Sharon F. McKee

# **EXHIBIT A**

## Supreme Court of Pennsylvania

Court of Common Pleas

Civil Case Sheet

Chester

County

For Prothonotary Use Only

Docket No:

12 09204

2012 AUG 23

FILED

AMT: 39

The information collected on this form is used solely for court administration purposes. This form does not supplement or replace the filing and service of pleadings or other papers as required by law or rules of court.

SECTION A	Commencement of Action:		<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Writ of Summons	<input type="checkbox"/> Petition
			<input type="checkbox"/> Transfer from Another Jurisdiction		<input type="checkbox"/> Declaration of Taking
	Lead Plaintiff's Name:		Lead Defendant's Name:		
	John Johnson		LexisNexis Risk & Information Analytics		
	Are money damages requested? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Dollar Amount Requested: <input checked="" type="checkbox"/> within arbitration limits (check one) <input type="checkbox"/> outside arbitration limits		
Is this a Class Action Suit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Is this an MDJ Appeal? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Name of Plaintiff/Appellant's Attorney: Vicki Plontek, Esquire					
<input type="checkbox"/> Check here if you have no attorney (are a Self-Represented [Pro Se] Litigant)					

SECTION B	<b>Nature of the Case:</b> Place an "X" to the left of the <u>ONE</u> case category that most accurately describes your <b>PRIMARY CASE</b> . If you are making more than one type of claim, check the one that you consider most important.	
	<b>TORT (do not include Mass Tort)</b> <input type="checkbox"/> Intentional <input type="checkbox"/> Malicious Prosecution <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Nuisance <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability (does not include mass tort) <input type="checkbox"/> Slander/Libel/ Defamation <input checked="" type="checkbox"/> Other: 15 USC 1681 et. seq.	<b>CONTRACT (do not include Judgments)</b> <input type="checkbox"/> Buyer Plaintiff <input type="checkbox"/> Debt Collection: Credit Card <input type="checkbox"/> Debt Collection: Other  <input type="checkbox"/> Employment Dispute: Discrimination <input type="checkbox"/> Employment Dispute: Other  <input type="checkbox"/> Other:
	<b>MASS TORT</b> <input type="checkbox"/> Asbestos <input type="checkbox"/> Tobacco <input type="checkbox"/> Toxic Tort - DES <input type="checkbox"/> Toxic Tort - Implant <input type="checkbox"/> Toxic Waste <input type="checkbox"/> Other:	<b>CIVIL APPEALS</b> Administrative Agencies <input type="checkbox"/> Board of Assessment <input type="checkbox"/> Board of Elections <input type="checkbox"/> Dept. of Transportation <input type="checkbox"/> Statutory Appeal: Other  <input type="checkbox"/> Zoning Board <input type="checkbox"/> Other:
	<b>PROFESSIONAL LIABILITY</b> <input type="checkbox"/> Dental <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional:	<b>REAL PROPERTY</b> <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Ground Rent <input type="checkbox"/> Landlord/Tenant Dispute <input type="checkbox"/> Mortgage Foreclosure: Residential <input type="checkbox"/> Mortgage Foreclosure: Commercial <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Other:
	<b>MISCELLANEOUS</b> <input type="checkbox"/> Common Law/Statutory Arbitration <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Mandamus <input type="checkbox"/> Non-Domestic Relations Restraining Order <input type="checkbox"/> Quo Warranto <input type="checkbox"/> Replevin <input type="checkbox"/> Other:	

Att. 3/8/13  
@ 9:00am

Updated 1/1/2011

IN THE COURT OF COMMON PLEAS  
OF CHESTER COUNTY, PENNSYLVANIA  
CIVIL ACTION-LAW

FILED

2012 AUG 29 AM 11:39

John Johnson  
670 Marshall Road  
Glenmoore, PA 19343  
Vs.

Plaintiff

LexisNexis Group  
9443 Springboro Pike  
Dayton, OH 45342

and

LexisNexis Risk Solutions Bureau, LLC  
1000 Alderman Drive,  
Alpharetta, Fulton County, Georgia 30005.

and

LexisNexis Risk Solutions Bureau, LLC  
c/o The Corporation Trust Company  
1209 Orange Street  
Wilmington, DE 19801

and

John Does 1-10  
(address unknown)  
and

X,Y,Z Corporations  
(address unknown)

Defendant(s)

OFFICE OF THE  
PROTHONOTARY  
CHESTER CO. PA.

12-09201

Jury Trial Demanded

PRECIPE TO ISSUE WRIT OF SUMMONS

To: The Prothonotary:

Kindly issue a writ of summons against the Defendant(s) captioned above.

Thank you.

Vicki Piontek 8/27/2012  
Vicki Piontek, Esquire Date

Attorney for Plaintiff  
951 Allentown Road  
Lansdale, PA 19446  
877-737-8617  
palaw@justice.com  
Fax: 866-408-6735

FILED CLERK OF COURT

IN THE COURT OF COMMON PLEAS  
OF CHESTER COUNTY, PENNSYLVANIA  
CIVIL ACTION-LAW

FILED

2012 AUG 29 AM 11:39

OFFICE OF THE  
PROTHONOTARY  
CHESTER CO. PA.

2012-09201

John Johnson  
670 Marshall Road  
Glenmoore, PA 19343  
Vs. Plaintiff  
LexisNexis Group  
9443 Springboro Pike  
Dayton, OH 45342  
and  
LexisNexis Risk Solutions Bureau, LLC  
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and  
LexisNexis Risk Solutions Bureau, LLC  
c/o The Corporation Trust Company  
1209 Orange Street  
Wilmington, DE 19801  
and  
John Does 1-10  
(address unknown)  
and  
X,Y,Z Corporations  
(address unknown)

Defendant(s)

Jury Trial Demanded

WRIT OF SUMMONS

TO: LexisNexis Group  
9443 Springboro Pike  
Dayton, OH 45342  
and  
LexisNexis Risk Solutions Bureau, LLC  
1000 Alderman Drive,  
Alpharetta, Georgia 30005.  
and  
LexisNexis Risk Solutions Bureau, LLC  
c/o The Corporation Trust Company  
1209 Orange Street  
Wilmington, DE 19801  
and  
John Does 1-10  
and  
X,Y,Z Corporations

You are notified that John Johnson has commenced an action against you.

SEAL OF  
THE  
COURT

*Raymond A. Dethlefs*  
Prothonotary

8/29/12  
Date

By *Carol Krumm, Esq.*

# **EXHIBIT B**

Prothonotary &gt; Case #2012-09201-TT &gt; JOHNSON, JOHN VS. LEXISNEXIS GROUP ET AL

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3/6/2013 11:26 AM

**Case Details**Case#: **2012-09201-TT**  
Case Type: **OTHER TORT**Initial Date: **8/29/2012**  
Status: **PENDING**  
Status Date: **8/29/2012**Judge: **MAHON, WILLIAM P.**

Date	Docket Notes
8/29/2012	PRAECIPE TO ISSUE WRIT OF SUMMONS - WRIT ISSUED
8/29/2012	0002 - ATTORNEY STATUS
	Attorney PIONTEK, VICKI representing Plaintiff JOHNSON, JOHN as of 08/29/2012
8/29/2012	CIVIL COVER SHEET FILED
	WRIT OF SUMMONS, MONEY DAMAGES REQUESTED, NON CLASS ACTION SUIT
	COVER SHEET SHOWS - LEXISNEXIS RISK & INFORMATION ANALYTICS WHICH IS NOT SHOWN ON THE WRIT
8/29/2012	PRAECIPE TO PROCEED IN FORMA PAUPERIS PURSUANT TO PENNSYLVANIA RULE OF CIVIL PROCEDURE 240 BY VICKI PIONTEK ESQ ATTY FOR PLTF
8/29/2012	EVENT SCHEDULED
	Event: ARBITRATION
	Date: 03/08/2013 Time: 9:00 am
	Judge: ZARB, 20130308 Location: ARBITRATION
1/15/2013	COPIES Receipt: 632694 Date: 01/15/2013